

E911 Phase II Implementation Report

Price Communications Wireless, Inc. ("PCW") hereby submits this report on its plans for implementing Phase II enhanced 911 service, pursuant to Section 20.18(i) of the Commission's Rules, 47 C.F.R. §20.18(i); the Commission's *Fourth Memorandum Opinion and Order*, FCC 00-326, released September 8, 2000, in CC Docket No. 94-102; and *Public Notice*, DA 00-2099, released September 14, 2000, in CC Docket No. 94-102.

Carrier Identifying Information:

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TRS Numbers:

<u>TRS ID</u>	<u>Legal Name of Carrier</u>
802230	Price Communications Wireless VI, Inc.
802248	Palmer Wireless Holdings, Inc.
807576	Price Communications Wireless VIII, Inc.
802245	Price Communications Wireless IX, Inc.
802239	Price Communications Wireless VII, Inc.
802233	Price Communications Wireless III, Inc.
802242	Price Communications Wireless IV, Inc.
802227	Price Communications Wireless V, Inc.

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E911 Phase II Location Technology Information:

Type of Technology:

PCW intends to use a handset-based solution in implementing enhanced 911 Phase II technology. PCW has not found a practical network-based solution commercially available to carriers of PCW's size and scope of service. As a consequence of PCW's small size, it generally purchases equipment from wholesale distributors. The network-based equipment appears to be sold by manufacturers. PCW intends to acquire handsets employing ALI technology from a

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wholesale distributor. PCW intends to use whatever ALI-capable handsets are available from the wholesale distributor.

Implementation; Existing Handsets; Schedule:

In the initial phases of the deployment schedule, the use of handset-based ALI technology will require PCW's current customers who would like enhanced 911 service, to purchase more expensive ALI-capable handsets. The initial phase will also require new customers to purchase more expensive handsets employing ALI technology. In the later phases of the deployment schedule, when the interim penetration benchmarks increase significantly, the use of handset-based ALI technology will, in all probability, require handset upgrades as well.

PCW has been advised by the wholesalers with whom it does business that an ALI-capable handset model will not be available until the second half of 2001, and that it does not expect to have other ALI-capable handset models available before 2003 or 2004.

PCW intends to comply with the FCC's penetration benchmarks. However, PCW also anticipates that ALI-capable handsets will be made available to larger operators first, and that, because wholesale distributors will have only limited supplies of the ALI-capable handsets, there may not be a sufficient supply of ALI-capable handsets to meet the needs of a smaller operator like PCW. PCW will consider acquiring other E911 equipment if and when it becomes available and PCW can compare its costs to the ALI-capable handsets.

If PCW is required to make any changes in its implementation plans, it will notify the Commission of same within thirty days of the adoption of any changes, as required by Section 20.18(i) of the Commission's Rules.

Testing and Verification:

PCW intends to verify conformance with the Phase II accuracy requirements by acquiring handsets that the manufacturers represent are accurate within the limits specified by the Commission's Rules. PCW will rely on information received from its wholesale distributors that provides some assurance that the manufacturers are offering ALI-capable handsets that comply with the accuracy rules. Additionally, PCW intends to follow the guidelines in OET Bulletin No. 71 for determining the accuracy of its ALI solution.

Existing Handsets:

As mentioned above, PCW expects that non-ALI compliant handsets will be replaced over time primarily through natural attrition.

Location of Roamers:

PCW should be able to provide incoming roamers the same location information it provides to its own customers with ALI-capable handsets, provided such incoming roamers have handset that employ CDMA and ALI technology. Even if PCW is not able to find the exact location of a roamer, it should, at least, be able to locate the cell site with which the roamer is connected.